

Business Ethics Policy

April 2016

Introduction

Acting responsibly and with integrity is deeply engrained in the Flying Tiger Copenhagen organisation and identity. We have a zero tolerance policy on bribery and corruption and we are committed to conduct our business in an honest and ethical manner in all our business dealings and relationships wherever we operate.

Corruption prevents equal treatment of people and equal access to public goods. It is one of the leading obstacles to rule of law and sustainable economic growth and social development.

This policy communicates our commitment to prevent and mitigate corruption and bribery. It is supported by a Business Ethics Code of Conduct that communicates our expectations to the ethical conduct of our people and partners.

The policy applies to all individuals at all levels working at Flying Tiger Copenhagen. It also applies to third party and intermediaries and other persons acting on behalf of us or any of our partners or their employees.

Bribery, facilitation payments and extortion

We do not tolerate any form of bribery whether direct or indirectly via third-parties. This prohibition covers interactions with public officials and individuals in the private sector. This includes facilitation payments or 'grease payments' to public officials. We will do so by referring to this policy.

We do not accept extortion. Such payments are only permissible in exigent cases when the health, security or safety of an employee is at risk. In this case, the incident must always be reported to CSR & Compliance.

Gifts, hospitalities (means and entertainment)

We do not offer, give or accept gifts, entertainment or any other advantages if they exceed local triviality limits. Gifts, entertainment and hospitality are only acceptable if they are reasonable, proportionate and made in good faith.

Conflict of interests

We avoid conflict of interests. Conflicts of interest may arise if personal interests compete or conflict with the interests of Flying Tiger Copenhagen. Business decisions must always be made in the best interests of Flying Tiger Copenhagen.



Donations, contributions and sponsorships

We support local communities through product donations and by engaging in other charitable activities. All donations are transparent and we do not support political campaigns or parties.

Books, records and financial reporting

We keep our records accurately and completely so that they reflect the company's transactions and assets. We deliver fair and accurate reporting of our financial results in line with generally accepted accounting principles.

Fair competition

We respect international and national competition law and do not engage in any activities with regard to pricing, customer handling or competition that is in breach with such laws.

Compliance with this policy

Breaches of this policy or violations of any anti-corruption laws, may result in disciplinary action. This may involve civil or criminal penalties or termination of employment at Flying Tiger Copenhagen.

Employees are obligated to immediately report breaches or suspected breaches of this policy. Reports should be directed to one of the following: 1) Manager or manager's manager; 2) CSR & Compliance Function at Zebra.

Any form of retaliation against employees who reports a breach or a suspected breach of this policy is strictly prohibited.

For questions regarding this policy, please contact CSR & Compliance at Zebra.

